

Exhibit A

In Re: Bard IVC Filters Products Liability

Page 8

1 Q. Other than your attorneys and your wife, have
2 you talked to anyone else about this lawsuit?

3 A. No, sir, I have not.

4 Q. Have you talked to anyone else about this
5 deposition?

6 A. No, sir.

7 Q. Have you discussed this lawsuit with any of
8 Mrs. Jones' medical providers?

9 A. No, sir.

10 Q. And who are the attorneys representing you in
11 this case?

12 A. The attorneys that are sitting here today.

13 Q. And before filing this lawsuit, did you
14 contact any other attorneys?

15 A. No, sir.

16 Q. Before filing this lawsuit, have you seen any
17 television advertisements related to IVC filters?

18 A. No, sir.

19 Q. And why did you decide to file this lawsuit?

20 A. I never decided to file. I was worried about
21 my wife's health being she had this strut stuck in her
22 and was told that the procedure was supposed to be a
23 permanent procedure.

24 But then that happened, it broke, she had to
25 go back under and have it removed. And I just was

In Re: Bard IVC Filters Products Liability

Page 9

1 looking for some answers.

2 Q. And were the attorneys here today the first
3 attorneys you contacted?

4 A. Yes, they were.

5 Q. And how did you find them?

6 A. I was looking on Facebook and a little
7 pop-up -- and when it popped up, that's what took my
8 mind back to thinking about my wife more so. And I was
9 wondering if I could get any further information about
10 filters, not looking to go as far as suing.

11 Q. And the pop-up was related to IVC filters
12 specifically?

13 A. IVC filters, and I think that was basically
14 all it was because it was just like a little pop-up
15 (indicating). It wasn't an ad. It was just a
16 (indicating).

17 Q. Do you recall what it said?

18 A. Not word for word, I don't. I just remember
19 it saying IVC filters, your loved one. Basically
20 something to the effect if you or a loved one had an
21 IVC filter that has broken, something to that effect.

22 Q. And did you click on a link or call a phone
23 number?

24 A. I actually clicked the link, but then it
25 didn't give me an actual, I'd say, website, so to